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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X
In re TREMONT SECURITIES LAW, STATE
LAW AND INSURANCE LITIGATION

Master Docket No. 08-Civ-11117(TPG)

X
YALE M. FISHMAN 1998 INSURANCE
TRUST, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

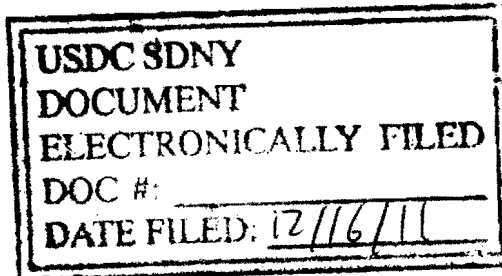
vs.

AGL LIFE ASSURANCE COMPANY, et al.,

Defendants.

X

Civil Action No. 11-cv-1283 (TPG)
:
:
STIPULATION AND [PROPOSED] ORDER
:
EXTENDING TIME TO FILE AMENDED
:
COMPLAINT, MOTION TO DISMISS AND
:
RELATED BRIEFING



WHEREAS, on August 19, 2011, this Court approved a partial settlement in *In re Tremont Securities Law, State Law and Insurance Litigation*, No. 08-Civ-11117 (TPG) (S.D.N.Y. 2009);

WHEREAS, the Court held a status conference on October 20, 2011 to determine how fourteen of the consolidated actions, including this consolidated action (AGL Life Assurance Company did not have notice of the conference and, therefore, did not participate), should proceed;

WHEREAS, on November 14, 2011, the Court entered an Order, which, among other things, provided that: (i) Plaintiff shall file its amended complaint by December 19, 2011; (ii) Defendants shall respond to the amended complaint by January 31, 2012; (iii) in the event that Defendants move to dismiss the amended complaint, Plaintiff shall file its opposition by February 29, 2012; and (iv) Defendants shall file their reply brief by March 20, 2012;

WHEREAS, Plaintiff seeks a two week extension of time to file and serve the amended complaint and to extend the schedule for the briefing on Defendants' anticipated answer or motion to dismiss;

WHEREAS, Defendants do not oppose such request; and

WHEREAS, there have been no prior requests to extend the time for the filing of the amended complaint;

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties, without waiving any rights, defenses or arguments they may assert, and subject to the approval of the Court, as follows:


1. Plaintiff shall file its amended complaint by January 3, 2012;
2. Defendants shall file their response to the amended complaint forty five (45) days after the filing of the amended complaint;

3. Should Defendants move to dismiss the amended complaint, Plaintiff shall file its opposition to Defendants' motion to dismiss forty-five (45) days after Defendants' motion to dismiss is filed; and

4. Defendants shall file its reply brief twenty (20) days after the filing of Plaintiff's opposition.

DATED: December 15, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
EDWARD Y. KROUB



DAVID A. ROSENFELD

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Attorneys for Plaintiff

DATED: December __, 2011

EDISON, MCDOWELL &
HETHERINGTON LLP
DAVID MCDOWELL
THOMAS F.A. HETHERINGTON

THOMAS F.A. HETHERINGTON

Phoenix Tower
3200 Southwest Freeway, Suite 2920
Houston, TX 77027
Telephone: 713/337-5583

*Attorneys for Defendant AGL Life Assurance
Company*

3. Should Defendants move to dismiss the amended complaint, Plaintiff shall file its opposition to Defendants' motion to dismiss forty-five (45) days after Defendants' motion to dismiss is filed; and

4. Defendants shall file its reply brief twenty (20) days after the filing of Plaintiff's opposition.

DATED: December __, 2011

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EDWARD Y. KROUB

DAVID A. ROSENFELD

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Attorneys for Plaintiff

DATED: December 15, 2011

EDISON, MCDOWELL &
HETHERINGTON LLP
DAVID MCDOWELL
THOMAS F.A. HETHERINGTON

 by permission
THOMAS F.A. HETHERINGTON HB5

Phoenix Tower
3200 Southwest Freeway, Suite 2920
Houston, TX 77027
Telephone: 713/337-5583

*Attorneys for Defendant AGL Life Assurance
Company*

DATED: December 15, 2011

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM, LLP
SETH M. SCHWARTZ
JASON C. VIGNA



SETH M. SCHWARTZ

Four Times Square
New York, New York 10036
Telephone: 212/735-3000

Attorneys for Tremont Defendants

* * *

ORDER

IT IS SO ORDERED.

DATED: 12/16/11



THE HONORABLE THOMAS P. GRIESA
UNITED STATES DISTRICT JUDGE

